

**NOTICE OF REMOVAL**  
**EXHIBIT A – AMENDED COMPLAINT**

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

MARLENA ROSS, on behalf of herself  
and others similarly situated,

Plaintiff,

v.

PACIFIC MARITIME ASSOCIATION  
("PMA"); SEATTLE JOINT PORT LABOR  
RELATIONS COMMITTEE ("JPLRC");  
SSA TERMINALS, LLC.;

Defendants.

INTERNATIONAL LONGSHORE AND  
WAREHOUSE UNION (ILWU) LOCAL  
19,

Intervenor-Defendant.

NO. 18-2-20277-9 SEA

AMENDED COMPLAINT FOR  
DAMAGES AND FOR RULE  
23(b)(2) DECLARATORY AND  
INJUNCTIVE RELIEF

Plaintiff Marlena Ross alleges the following claims for sex discrimination,  
pregnancy discrimination, and hostile work environment against Defendants  
Pacific Maritime Association, Seattle Joint Port Labor Relations Committee,  
and SSA Terminals, LLC.

**I. PARTIES**

1.1 Plaintiff Marlena Ross ("Ross") is a citizen of the state of  
Washington. She has performed work for defendant Pacific Maritime

1 Association ("PMA") and been employed by defendant in the state of  
 2 Washington as a longshore worker since 2006.

3 1.2 Defendant Pacific Maritime Association is a foreign association of  
 4 shipping and warehouse companies incorporated in the State of California and  
 5 operating in the ports of the State of Washington, including the ports of Tacoma  
 6 and Seattle. Defendant's Washington state registered agent is located in  
 7 Thurston County. Defendant employs longshore workers on behalf of its  
 8 members, shipping and warehouse companies.

9 1.3 Defendant Seattle Joint Port Labor Relations Committee  
 10 ("JPLRC") is a committee comprised of union representatives, PMA  
 11 representatives, and employer representatives who administer the parties'  
 12 labor agreement.

13 1.4 Defendant SSA Terminals, LLC., ("SSA") is a Washington  
 14 corporation operating container terminals in ports of the state of Washington  
 15 and employs longshore workers including Ms. Ross at the terminals it leases in  
 16 Seattle. SSA leases and operates terminals 18 and 30 in Seattle where Plaintiff  
 17 Ross worked and one or more of the alleged discriminatory acts herein  
 18 occurred and the discriminatory practices alleged herein took place. At all times  
 19 material to allegations herein, while Ms. Ross was working at terminals 18 and  
 20 30, Defendant SSA was Ms. Ross' employer. Defendant's principal place of  
 21 business is King County, Washington. At all relevant times herein alleged, SSA  
 22 was a member of the Defendant Pacific Maritime Association ("PMA") and had  
 23 one or more representatives on the Defendant JPLRC.

## 24 II. FACTS

### 25 A. Longshore Seniority, Work, and Work Assignments

26 2.1 Longshore workers include workers who are classified for  
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1 seniority purposes by PMA and the longshore unions as “unidentified casuals,”  
2 “identified casuals,” “B registered” and “A registered” workers. “A registered  
3 workers” are the most senior.

4 2.2 The International Longshore and Warehouse Union (“ILWU”) is  
5 the exclusive bargaining representative of the workers employed by PMA.

6 2.3 Each port has a local ILWU. In Seattle, the ILWU is Local 19.

7 2.4 In order to obtain work as a longshore worker in the state of  
8 Washington for PMA and its members, workers must report to a dispatch hall  
9 and be dispatched on a daily basis to a job. The dispatch hall procedures are  
10 jointly operated and controlled by PMA and the local longshore unions.

11 2.5 The dispatching of workers to a job is done on the basis of  
12 seniority starting with “A” registered workers and continuing through  
13 “unidentified casual” workers, where work is available. Workers may not obtain  
14 longshore work for PMA and its members directly from PMA and its members,  
15 but must be dispatched through the dispatch hall. All longshore workers are  
16 authorized by PMA and its members to be present at the dispatch hall and  
17 must be present to obtain work.

18 2.6 During all relevant periods, PMA and its members have obtained  
19 longshore workers on a daily basis from dispatch halls located in various ports  
20 in the State of Washington, including Seattle, Tacoma, Vancouver, Longview  
21 and other ports.

22 2.7 Plaintiff Ross has obtained work for PMA and its members  
23 through the dispatch hall located in Seattle.

24 2.8 Longshore workers obtained work through the dispatch halls in  
25 the state of Washington by receiving a job assignment from the dispatcher for  
26 one of the PMA members. Job assignments are given out only for work on that  
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1 particular day and a longshore worker must return for another dispatch to  
2 receive work the next day or on another day.

3 2.9 Plaintiff Ross received longshore jobs in the manner specified in  
4 the paragraph above.

5 2.10 After receiving the job assignment from the dispatcher, a worker  
6 must travel to the job which is located at a terminal at a distance away from the  
7 dispatch hall. The job generally consists of one or more longshore jobs loading  
8 or unloading a vessel, working in a warehouse, and/or performing paper work  
9 associated with the loading or unloading of vessels.

10 2.11 SSA leases terminals 18 and 30.

11 2.12 Eli Bohm manages terminal 18 and Damien Bressler manages  
12 terminal 30.

13 2.13 Eli Bohm and Damien Bressler made the decision to not have a  
14 lactation room available to female longshore workers and created a hostile  
15 work environment towards female workers.

16 2.14 PMA follows a "40% availability rule" for all causals. This means  
17 an identified casual worker must show up at the dispatch hall to request a work  
18 shift at least 40% of the time, or the worker will be removed as a longshore  
19 worker.

20 2.15 PMA follows a "60% availability rule" with B class workers. A  
21 class workers do not have an availability rule.

22 2.16 Longshore workers are supposed to advance in seniority from  
23 unidentified casual, to identified casual, to "B registered" to "A registered"  
24 based on the number of hours worked.

25 2.17 Decisions about advancement in seniority are made by the local  
26 Joint Port Labor Relations Committee ("JPLRC") at each port, which is  
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1 comprised of representatives of PMA and the ILWU.

2 2.18 During Ms. Ross's tenure as a longshore worker, PMA, through  
3 its representatives in the JPLRC, repeatedly changed the metric for counting  
4 "hours worked" for advancement discriminatorily.

5 2.19 PMA's, its members who employ longshore workers in Seattle  
6 and JPLRC's shifting metric has had the intent and effect of advancing men  
7 through the ranks to become B registered and A registered workers, and  
8 denying women who became pregnant and took leave to have children the  
9 ability to advance in the ranks.

10 2.20 Various classes of longshore workers receive credit towards  
11 "hours worked" while they are on leave from work or unable to work as a  
12 longshore worker. Classes of workers who receive credit towards hours  
13 worked include: those who have "industrial illness or injury arising out of  
14 employment," military service members; workers serving as full-time union  
15 officials; workers serving as jurors.

16 2.21 PMA, its members who employ longshore workers in Seattle and  
17 JPLRC discriminate against female, pregnant longshore workers by not  
18 providing them with credit towards "hours worked" while they are on leave from  
19 work with pregnancy-related restrictions or while recovering from childbirth.  
20 The lack of credited hours means that female longshore workers who have  
21 children and take maternity leave do not advance as quickly in seniority as  
22 other, predominantly male workers.

23 2.22 Various classes of longshore workers are also given "light duty"  
24 assignments while needed. Classes of workers include those recovering from  
25 industrial injury arising out of employment. These workers continue to receive  
26 job assignments, pay, and to accumulate "hours worked" towards advancement  
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1 while working in “light duty” roles.

2 2.23 PMA, its members who employ longshore workers in Seattle and  
3 JPLRC discriminate against pregnant longshore workers by not providing them  
4 with light duty assignments. As a result, many pregnant longshore workers are  
5 forced to take leave from work altogether while pregnant because they cannot  
6 engage in some of the more taxing duties of certain longshore jobs, such as  
7 heavy lifting.

8 **B. Plaintiff Ross**

9 2.24 Since 2007, Ross has performed longshore work for PMA and its  
10 members.

11 2.25 Ross became a longshore worker through a lottery through the  
12 Seattle Times.

13 2.26 She began work as an unidentified casual, the lowest seniority.  
14 Later in 2007 Ross became an “identified casual” longshore worker.

15 2.27 The mentality at the Ports for casuals is that, if you cannot come  
16 to work and work 100%, do not come to work at all.

17 2.28 Plaintiff Ross first became pregnant in 2009.

18 2.29 During her pregnancy, Ross continued to perform the longshore  
19 jobs involving heavy work because she felt that she had to in order to be  
20 assigned work.

21 2.30 In March 2010, Ross suffered a miscarriage due to over-exertion.

22 2.31 In the summer of 2010, Ross became pregnant again. Because  
23 of her prior miscarriage, Ross’s doctor restricted her from performing work that  
24 involved heavy lifting.

25 2.32 PMA did not offer Ross light duty assignments so Ross had to  
26 stop working altogether during her pregnancy.  
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1           2.33 During this time, PMA attempted to remove her as a longshore  
2 worker under its “40% availability rule.” Ross provided a doctor’s note  
3 outlining her pregnancy-related work restrictions. PMA ultimately granted Ross  
4 a temporary disability and a waiver from removal.

5           2.34 Ross’s daughter was born in April 2011. She returned to work  
6 four months later.

7           2.35 PMA and the JPLRC did not provide Ross credit towards “hours  
8 worked” for the hours that she missed work due to her pregnancy-related  
9 restrictions or her recovery from childbirth.

10          2.36 During her pregnancy and recovery from childbirth, Ross dropped  
11 113 spots on the list for advancing in seniority.

12          2.37 When Ross returned to work, she needed to express milk.

13          2.38 PMA, JPLRC, and SSA did not provide Ross with a lactation  
14 room. Ross was forced to pump in her car during her lunch break.

15          2.39 In 2010, the JPLRC decided to advance 90 identified casuals to B  
16 registered workers. JPLRC calculated relevant hours beginning from the last  
17 quarter after they had advanced people previously.

18          2.40 Because PMA denied Ross light duty during her pregnancy and  
19 she was forced to take off work completely, Ross did not have sufficient  
20 qualifying hours and was not advanced to a B registered worker.

21          2.41 In 2011, the JPLRC decided to advance an additional 17  
22 identified casuals to B registered workers. JPLRC calculated relevant hours  
23 beginning from the last quarter after they had advanced people previously.

24          2.42 Like before, because PMA denied Ross light duty during her  
25 pregnancy and she was forced to take off work completely, Ross did not have  
26 sufficient qualifying hours and was not advanced to a B registered worker.  
27



1           2.43 In May 2013, Ross became pregnant with her second child.

2           2.44 PMA did not offer Ross light duty assignments so Ross had to  
3 stop working altogether during her pregnancy.

4           2.45 Ross's son was born in January 2014. She returned to work in  
5 April 2014.

6           2.46 PMA and JPLRC did not provide Ross credit towards "hours  
7 worked" for the hours that she missed work due to her pregnancy-related  
8 restrictions or her recovery from childbirth.

9           2.47 During her pregnancy and recovery from childbirth, Ross dropped  
10 55 spots on the list for advancing in seniority.

11           2.48 When Ross returned to work, she needed to express milk.

12           2.49 PMA, JPLRC, and SSA did not provide Ross with a lactation  
13 room. Ross was forced to pump in her car during her lunch break.

14           2.50 On June 23<sup>rd</sup>, 2015 the JPLRC decided to advance an additional  
15 2 identified casuals to B registered workers.

16           2.51 This time, instead of calculating relevant hours beginning from the  
17 last quarter after they had advanced people previously, the JPLRC calculated  
18 based on "total industry hours."

19           2.52 This arbitrary and discriminatory change in metrics again harmed  
20 Ross because the time off during her pregnancies and her maternity leaves  
21 counted against her.

22           2.53 In January 2016, Ross became pregnant with her third child.

23           2.54 In February 2016, Ross told PMA that she intended to pump at  
24 work upon her return after the baby's birth and requested light duty as an  
25 accommodation.

26           2.55 This time, PMA granted Ross the accommodation, but she often  
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1 had to explain to each new dispatcher each day that she had an  
2 accommodation and that she needed light duty assignments.

3 2.56 During the summer of 2016, Ross reminded PMA that she would  
4 need a lactation room to be ready upon her return to work.

5 2.57 Ross's son was born in September 2016.

6 2.58 PMA and JPLRC did not provide Ross credit towards "hours  
7 worked" for the hours that she missed work due to her pregnancy-related  
8 restrictions or her recovery from childbirth.

9 2.59 In December 2016, Ross provided PMA with a doctor's note  
10 stating that she is cleared to return to work but needs a clean and private  
11 space to be able to express breastmilk/pump during the workday.

12 2.60 PMA did not respond.

13 2.61 In January and for the next two months, Ross continued to inquire  
14 with PMA, on the phone and in writing, about her return to work and their  
15 accommodations for her medical need to pump at work.

16 2.62 Finally, on March 3, 2017 – six months after her son was born –  
17 Ross's union representative informed her that she could return to work and  
18 pumping facilities would be made available.

19 2.63 Ross appeared at the dispatch hall the next day, but did not get  
20 her first shift until March 10, 2017.

21 2.64 There was no place for her to pump and she was forced to pump  
22 in a conference room with glass windows. There was no refrigerator and Ross  
23 was forced to dump the milk she had expressed.

24 2.65 Eli Bohm and Damien Bressler made the decision to not have a  
25 private lactation room available upon Ross's return to work.

26 2.66 Throughout 2017 while Ross was attempting to express milk at  
27

1 work, defendants did not provide Ross with adequate, clean pumping facilities  
2 as required by law.

3 2.67 On various occasions, SSA required Ross to use a room in the  
4 SSA administration building that was jointly being used for storage.

5 2.68 On April 14, 2017, someone unlocked the door while Ross was  
6 pumping – with full knowledge that she was in the room – and entered the  
7 room while Ross was fully exposed.

8 2.69 Frequently while she was pumping, over required walkie-talkies,  
9 Ross was harassed over the amount of time it took her to pump, and was  
10 asked why she wasn't back to work.

11 2.70 One of the locations that SSA provided Ross in which to pump  
12 was an unsanitary room with dead flies in the refrigerator. Eli Bohm and  
13 Damien Bressler were aware of the room's conditions.

14 2.71 The day after pumping in that facility, Ross got mastitis, MRSA,  
15 clogged milk ducts, and a staph infection.

16 2.72 PMA, JPLRC, and SSA also erected unnecessary barriers to  
17 Ross's ability to efficiently pump at work.

18 2.73 Rather than allowing her to drive her work vehicle to the  
19 nearest/preferred pumping location, SSA required her to call SSA's security  
20 bus, wait for it to come pick her up, and have the security bus drop her at the  
21 pumping location.

22 2.74 Ross often had to wait fifteen minutes for the security bus to  
23 arrive. She had to repeat the procedure when she was done pumping.

24 2.75 On one occasion, she got to pumping facility and had to wait an  
25 hour for someone to find a key to unlock the door to the room.

26 2.76 In March 2017, Ross filed a three grievances with the IWLU Local  
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19 regarding the inadequate pumping facilities and the hostile work environment surrounding her pumping efforts.

2.77 After she filed a grievance, SSA and PMA retroactively began to dock Ross's pay and deduct from her pay the time she was pumping, including the time it took the SSA security bus to transport her, the time it took for a security guard to find and unlock the room, and other SSA-caused delays.

2.78 If Ross had never become pregnant, or had she been given credit for hours missed due to pregnancy and child birth related leave, she would have advanced to become a B Registered worker in approximately 2010, and an A Registered worker in 2015.

2.79 As a result of not being given credit towards "hour worked," Ross is still an identified casual. As an identified casual, Ross is not a union member, receives lower wages, has no paid vacation days, and ranks behind A and B registered workers for work assignments.

2.80 Between 2012-2016, the JPLRC moved up 2 casuals to B registered.

2.81 In late 2017 through the second quarter of 2018, the JPLRC announced that it would be moving 82 people up in seniority.

2.82 Instead of basing the promotions on hours worked beginning from the last quarter since they last advanced people, the JPLRC decided to base this round of promotions on total industry hours.

2.83 Ross was not advanced.

2.84 If Ross had been given credit towards "hour worked" for each of her pregnancies, Ross would be one of the 82 people being promoted.

### III. Class Action Allegations

3.1 This action is brought on behalf of the class defined below for

1 declaratory and injunctive relief based on defendants PMA, JPLRC and SSA's  
 2 violation of the Washington Law Against Discrimination, RCW 49.60. *et seq.*,  
 3 and violation of the Healthy Starts Act. The class is:

4 All female longshore workers in Washington from August 1, 2008 to  
 5 August 6, 2018, including workers who became pregnant and/or  
 6 took leave from work to recover from birth and care for an infant  
 between August 1, 2008 and August 6, 2018.

7 3.2 Numerosity. The above described class consists of a minimum of  
 8 100 workers and likely consists of over 200 workers, including over 45 workers  
 9 who became pregnant and/or took leave from work to recover from birth and  
 10 care for an infant between August 1, 2008 and August 6, 2018. The members  
 11 of the above described class are also geographically dispersed at various ports  
 12 in the state of Washington. The size of the class and its geographical  
 13 dispersion makes individual joinder impracticable.

14 3.3 Commonality. Common questions of law and fact exist as to the  
 15 claims of all class members, including:

- 16 a. Whether PMA discriminated against female workers including  
 17 workers who became pregnant through a policy or practice of  
 18 denying light duty work associated with pregnancy related  
 19 restrictions.
- 20 b. Whether PMA and JPLRC discriminated female workers including  
 21 workers who became pregnant through a policy or practice of  
 22 denying female workers credit towards hours missed while they  
 23 were forced to take leave during pregnancy because of lack of  
 24 light duty, thus hindering their advancement.
- 25 c. Whether PMA and JPLCRC discriminated female workers  
 26 including workers who became pregnant through a policy or  
 27 practice of denying female workers who have taken maternity

1 leave credit towards hours missed while on maternity leave, thus  
 2 hindering their advancement.

3 d. Whether the above described policies and practices have  
 4 discriminated against female workers by denying them the same  
 5 opportunities and benefits afforded male workers in the longshore  
 6 industry in Washington based on their gender.

7 3.4 Typicality. The claims of Plaintiff Ross are typical of the claims of the  
 8 class because they were subject to the same requirements, procedures,  
 9 policies and practices of PMA and its members as the other members of  
 10 the class.

11 3.5 Adequacy of Representation. Plaintiff Ross will fairly represent the class  
 12 and has no interests that conflict with members of the class. Plaintiff  
 13 shares the same interest as other members of the class in seeing that  
 14 damages and other requested relief is granted to Plaintiff and other  
 15 class members. Plaintiffs' counsel is knowledgeable about the policies  
 16 and practices of the PMA, has represented clients in employment cases  
 17 against the PMA and has been appointed class counsel in other cases  
 18 in which the PMA was a party and in other employment discrimination  
 19 cases.

20 3.6 CR 23(b)(2) Certification. Plaintiff Ross seeks certification of the above  
 21 class of female workers under CR 23(b)(2). The primary relief sought is  
 22 declaratory and injunctive relief for the class in the form of a declaration  
 23 that Defendant's Pacific Maritime Association, JPLRC, and SSA have  
 24 engaged in a pattern and practice of disparate treatment and disparate  
 25 impact sex discrimination and acts that created a hostile work  
 26 environment for female workers on the basis of their gender. Plaintiff  
 27

1 also seeks a declaration that defendant's Pacific Maritime Association,  
 2 JPLRC, and SSA have refused to accommodate female workers who  
 3 became pregnant and needed reasonable accommodations. The  
 4 injunctive relief sought for the class is to enjoin a continuation of this  
 5 pattern and practice of gender based discrimination. Any further or  
 6 additional relief that may be afforded the Class in the form of damages  
 7 caused by Defendants is secondary to the Plaintiff's request for  
 8 declaratory and injunctive relief.  
 9

#### 10 **IV. CLASS ACTION CLAIMS/CAUSES OF ACTION**

##### 11 **A. Pattern and Practice of Sex Discrimination**

12 4.1 Through the above described and complained of policies and  
 13 practices towards female longshore workers who become pregnant,  
 14 Defendants PMA, JPLRC and SSA ("Defendants") have engaged in a pattern  
 15 and practice of disparate treatment and disparate impact sex discrimination  
 16 and acts that created a hostile work environment for all female workers on the  
 17 basis of their gender by denying female workers the same benefits and  
 18 opportunities of employment afforded male longshore workers, including  
 19 plaintiff Ross.

20 4.2 Defendants have engaged in disparate treatment and disparate  
 21 impact discrimination on female longshore workers through their policies and  
 22 practices related to job assignments, light duty, lack of credit for hours on  
 23 pregnancy and childbirth related leave, and advancement in seniority. In all of  
 24 above respects, Defendants treat pregnant longshore workers and longshore  
 25 workers who give birth less favorably than men and other classes of workers.

26 4.3 Plaintiff Ross has been denied light duty, pay, and credited hours  
 27 during her pregnancies and while on maternity leave due to defendants' pattern



1 and practice of sexual discrimination, and due to defendants' intentional and  
2 disparate impact discrimination on the basis of sex.

3 4.4 Defendants' conduct constitutes a violation of the Washington  
4 Law Against Discrimination, RCW 49.60 et. seq. and a continuing violation of  
5 the law.

6 4.5 Defendants' conduct also constitutes a violation of the Healthy  
7 Starts Act, RCW 43.10 et seq.

#### 8 **B. Hostile Work Environment**

9 4.6 Defendants PMA, the Joint Port Labor Relations Committee, and  
10 SSA, have participated in, and/or aided and abetted, the creation and  
11 maintenance of a hostile work environment against female longshore workers  
12 in Washington on the basis of their sex as alleged the paragraphs above.  
13 Plaintiff Ross has been adversely affected by this hostile work environment.

14 4.7 Defendants' conduct constitutes sex discrimination in violation of  
15 the Washington Law Against Discrimination, RCW 49.60. et seq.

### 16 **V. INDIVIDUAL CLAIMS**

17 5.1 In addition to the claims of disparate treatment and disparate  
18 impact discrimination and violations of law adversely affecting Ms. Ross, as  
19 alleged above, Defendants PMA, and SSA denied Ms. Ross access to a clean,  
20 accessible, and legally sufficient facility for lactation.

21 5.2 Defendants PMA and SSA harassed Ross when she attempted to  
22 use the substandard lactation rooms that were provided.

23 5.3 In retaliation for her filing a grievance related to the substandard  
24 pumping facilities and harassment related to pumping, Defendant SSA docked  
25 Ross's pay for time spent expressing milk and travelling to and from the  
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1 lactation rooms, even though many of the delays and logistical hurdles were  
2 caused by SSA.

3 5.4 Based on the foregoing, Defendants have discriminated against  
4 Ross on the basis of her sex in violation of the Washington Law Against  
5 Discrimination, RCW 49.60. et seq.

6 5.5 Based on the foregoing, Defendants have retaliated against Ross  
7 on the basis of her sex in violation of the Washington Law Against  
8 Discrimination, RCW 49.60. et seq.

9 5.6 Defendants' conduct also constitutes a violation of the Healthy  
10 Starts Act, RCW 43.10 et seq.

11 5.7 Defendants' failure to provide Ms. Ross an appropriate lactation  
12 room also constitutes a violation of the Break Time for Nursing Mothers  
13 Provision of the FLSA, 29 U.S.C. § 207(r).

14 5.8 The Fair Labor Standards Act (FLSA), as amended by the Patient  
15 Protection and Affordable Care Act, 29 U.S.C. § 207(r), requires an employer  
16 to provide a suitable location and break times for the purpose of expressing  
17 breast milk for one year after a child's birth each time an employee has need to  
18 express milk. The location must be a place, other than a bathroom, that is  
19 shielded from view and free from intrusion by coworkers and the public.

## 20 VI. DAMAGES

21 6.1 The wrongful and discriminatory conduct of all the named  
22 defendants has caused plaintiff Ross, including lost past and future wages,  
23 income and earnings, out of pocket and emotional distress damages. These  
24 damages amount to less than \$5,000,000.

25 6.2 The wrongful, discriminatory, and retaliatory conduct of all the  
26 named defendants has caused plaintiff Ross damages, including lost past and  
27

1 future wages, income and earnings, out of pocket and emotional distress  
2 damages.

## 3 4 **VII. REQUEST FOR RELIEF**

5 Plaintiff Ross requests that the Court enter judgment against all named  
6 defendants for the following relief:

7 1. Awarding Plaintiff Ross the full measure of damages permitted by  
8 law on her individual claim.

9 2. Awarding prejudgment interest on any award of lost wages or  
10 economic loss.

11 3. Awarding statutory fees and costs.

12 4. Awarding actual attorney fees and litigation expenses as  
13 permitted by the Washington Law Against Discrimination, RCW 49.60 et. seq.  
14 and any other available statute.

15 5. Plaintiff Ross requests judgement against defendant's Pacific  
16 Maritime Association, JPLRC, and SSA for the following relief:

17 a. A declaration that defendants have engaged in a pattern  
18 and practice of gender discrimination and that they have failed to  
19 accommodate female workers who have become pregnant and needed  
20 reasonable accommodations.

21 b. Enjoining defendants from engaging further in its pattern  
22 and/or practice of sexual discrimination and/or those policies and  
23 practices which have a disparate impact because of their sex on the  
24 employment opportunities of female longshore workers.

25 6. Providing any further legal or equitable relief which the court  
26 deems appropriate.

1 DATED: October 11, 2019.

2  
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